

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**In re:**

**ROBERT EDWIN JACOBSEN**

xxx-xx-2723

P.O. Box 1386  
Lafayette, CA 94549

**Debtor.**

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**Case No. 07-41092-BTR**

**Chapter 7**

**RESPONSE OF TRUSTEE TO  
MOTION OF ROBERT JACOBSEN TO ABANDON CLAIMS**

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

Christopher J. Moser, Trustee, files this, his Response to Motion of Robert Jacobsen to Abandon Claims and would respectfully show the Court as follows:

1. This case is still ongoing. Due to, *inter alia*, two appeals filed by Robert Jacobsen (“Jacobsen”) and numerous other pleadings filed by Jacobsen, it is difficult to know when the administration of this case will end. There should be no urgency to abandon the properties. The Trustee is also not confident that any information supplied by Jacobsen regarding the value of any asset is credible.

2. More specifically, the Trustee does not believe it has been provided any accurate information regarding the value of the stock in Humboldt Equities 2, LLC and with the Ghana export business. In fact, Jacobsen states that the 50% partnership interest in the Ghana export business is “semi-profitable” and not transferable, when in fact the Bankruptcy Court would allow the transfer of the partnership interest.

3. The Trustee has been provided little or no information regarding the Brosnan claim. Jacobsen’s speculations about the law and venue are without merit.

4. The Trustee believes that there is value in the Ron Mort claim, the REJ Properties Inc. Promissory Note, the claims against Aime Green and the claim against Cynthia Cox. The Trustee anticipates filing Motions to Compromise involving these assets.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that the Court deny Motion to Abandon Claims and for such other and further relief as he may show himself justly entitled.

Respectfully submitted,

SINGER & LEVICK, P.C.

By: /s/Larry A. Levick  
Larry A. Levick  
State Bar No. 12252600

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ATTORNEYS FOR  
CHRISTOPHER J. MOSER, TRUSTEE

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Response has been served on the parties listed below via United States First Class Mail, postage prepaid on this 9<sup>th</sup> day of November, 2009.

/s/Larry A. Levick  
Larry A. Levick

Robert Jacobsen  
P.O. Box 1386  
Lafayette, CA 94549